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May 17, 2004

Filed Electronically

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

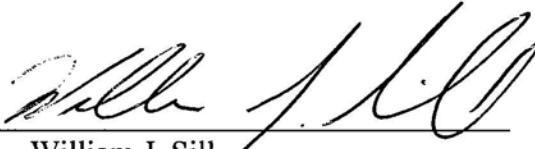
Dear Ms. Dortch:

Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,¹ attached please find a Hearing Aid-Compatibility status report submitted on behalf of Kodiak Wireless, LLC.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By: 
William J. Sill

Attachment

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

HEARING AID-COMPATIBILITY STATUS REPORT

May 17, 2004

**Kodiak Wireless, LLC
Licensee of:**

**(AK2) Alaska 2 (A2) - Bethel RSA
Call Sign: WPOL234**

Kodiak Wireless, LLC ("Kodiak") hereby provides the Commission with the Hearing Aid Compatibility Status Report ("Report"), as required by the Commission's *Hearing Aid-Compatible Report and Order*.¹ Kodiak is submitting this report in order to provide the Commission with the current status of Kodiak's efforts and progress toward compliance with the Commission's hearing aid-compatibility requirements. In preparing the instant Report, Kodiak followed the guidelines the Commission set forth in its *Hearing Aid-Compatible Report and Order*.²

Licensee Name and Contact Information:

Kodiak Wireless, LCC

c/o

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Licensee's Relationship to Equipment Manufacturers:

As a small carrier, Kodiak does not purchase a sufficient number of handsets to be allowed to buy directly from the handset manufacturers. Instead, Kodiak must rely on 'middle-men' or third party vendors who purchase new handsets from manufacturers and then sell them to small carriers. Kodiak regularly purchases handsets from the following third party vendors: Progressive Telecom, Brightpoint and American Connections. Currently, Kodiak stocks the following handset models: Nokia models: 5125, 3360, 2260, 8265, 3560 and Motorola models: V60it, 120t.

Kodiak's attenuated relationship with equipment manufacturers adversely impacts Kodiak in several respects. First, it is difficult to obtain up-to-the-minute information concerning equipment manufacturers' planned offerings. Second, prior experience has shown that this

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

² *Id.* at ¶ 89.

attenuated relationship results in Kodiak receiving the newer, more desirable, handset models long after the larger CMRS carriers receive them.

Licensees Hearing Aid-Compatibility Efforts to Date:

Kodiak has kept abreast, as best it can, with hearing aid-compatible handset offerings through contact with its third party vendors. In addition, Kodiak will continue to refine its customer outreach efforts.

Phone Models which Manufacturers State are Hearing Aid-Compatibility Compliant and ANSI C63.19 Rating:

To the best of Kodiak's knowledge, there are currently no hearing aid-compatibility compliant handsets that are compatible with Kodiak's TDMA/AMPS system. Instead, Kodiak has made available to its customers Nokia and Motorola handsets that are designed to accommodate loop set accessories. The loop sets when combined with a hearing aid renders the handset compatible for use with a hearing aid. The loop set is a headset that plugs into a handset and is worn around your neck instead of around your head or in your ear. The device takes the sound that the phone emits and converts it into an electromagnetic signal, which reduces/eliminates the static noise that users with hearing aids can experience.

Phone Models that Manufacturers State are Compatible with Hearing Aids:

As noted above, Kodiak has learned that Motorola and Nokia offer handsets that are designed to accommodate loop set accessories that enable these handsets to be compatible with many hearing aids.

Retail Availability of Compliant Phones:

Kodiak is not aware of any handsets which are hearing aid-compatibility compliant in the TDMA/AMPS spectrum.

Total Number of Compliant Phones Offered:

Other than the handsets Kodiak offers which can accept the loop set accessory, Kodiak does not offer any handsets which are hearing aid-compatible.

Total Number of Non-Compliant Phones Offered:

The 7 handset models offered by Kodiak are not hearing aid-compatibility compliant, however, all 7 of them can be used in conjunction with the loop set so as to be compatible with many hearing aids.

**Information Regarding Differences in Handset Offerings Among Regions in Service Areas
(For Service Providers Only):**

Kodiak is a small cellular carrier operating a single switch on the Island of Kodiak, Alaska. Accordingly, Kodiak is not able to provide any applicable information related to this request.

Efforts to Incorporate Hearing Aid-Compatibility into Newer Models:

Kodiak sells loop set accessories that work in conjunction with Motorola and Nokia handsets to allow the handsets to be compatible with many hearing aids.

Activities Related to ANSI C63.19 or other Standards of Work:

Kodiak will continue to keep abreast of developments in hearing aid-compatible handsets through third party vendors, consultation with its counsel, and interfacing with industry organizations, such as CTIA and RCA.

Ongoing Efforts for Interoperability Testing with Hearing Aids:

Due to its status as a small carrier, Kodiak is reliant upon handset manufacturers and industry standards groups to work towards a standard for interoperability testing as well as to conduct such tests.

Product Labeling Information:

Kodiak is able to provide its subscribers with new handsets through its one retail cellular store. Kodiak understands and will comply with the Commission's requirement that service providers ensure that information concerning hearing aid-compatible handsets, and more particularly a handset's U-Rating, is made visible to their subscribers.

Outreach Efforts

As hearing aid-compatible handsets become available, Kodiak intends to do the following to educate both their potential subscribers and their current subscribers on the hearing aid-compatible phones being offered:

- Provide potential subscribers and current subscribers with informational materials at Kodiak's retail store identifying compliant handsets, and directing these subscribers to ask retail store personnel for more information;
- Train retail employees to identify and provide information regarding compliant handsets;
- Make hearing aid-compatible related information available on Kodiak's web site, calling attention to the hearing aid-compatible handsets offered, their capabilities and other details regarding the compliant handsets, upon the next website update.